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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

Z.R., by and through her Guardian Ad Litem  
TANISHA PORTER,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Case No. 2:20-cv-01181-KJM-EFB

**JOINT MOTION TO EXTEND CASE  
DEADLINES**

Plaintiff Z.R., by and through her Guardian ad Litem Tanisha Porter, and Defendant United States of America respectfully request that the Court modify its scheduling order of February 12, 2021, and enter the attached Proposed Order extending the case schedule by 60 days.

This request is supported by good cause. The parties have been diligently conducting written discovery since February 2021 and are in the process of scheduling depositions. However, the parties are still attempting to gather important written discovery that needs to be exchanged before those depositions can take place. Plaintiff has indicated that she will be serving supplemental interrogatory responses and a document production early next week, and Defendant anticipates making at least one more supplemental production. The parties anticipate a possible need to confer further after those discovery supplementations. Additionally, the parties have encountered some logistical difficulties in scheduling depositions, especially since some of the witnesses are not under the control of the parties.

1 The parties require the forthcoming information to prosecute their respective cases, but do  
2 not believe completion of discovery by the existing November 5, 2021 deadline is feasible. The  
3 parties therefore respectfully request an additional 60 days to complete fact discovery, and an  
4 extension of the remaining case deadlines to accommodate the fact discovery extension. The parties  
5 state that their request is made in good faith, that good cause exists for the request, and that it is not  
6 being made for dilatory or any improper purpose.

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8 Respectfully submitted,

9 Dated: Oct. 5, 2021

/s/ K. Chike Odiwe (per 10/5/21 consent)  
K. CHIKE ODIWE  
Attorney for plaintiff

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13 Dated: Oct. 5, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

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15 /s/ Brodie M. Butland  
BRODIE M. BUTLAND  
Assistant U.S. Attorney  
Attorney for Defendant  
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**ORDER**

Good cause appearing to support the parties' joint motion to extend the case deadlines, IT IS  
HEREBY ORDERED that the Court's Scheduling Order of February 12, 2021 is hereby modified as  
follows:

- The parties shall complete all fact and expert discovery by January 4, 2022;
- Plaintiff's expert disclosures shall be completed by February 8, 2022;
- Defendant's expert disclosures shall be completed by March 29, 2022;
- Rebuttal experts shall be exchanged by April 12, 2022;
- All expert discovery shall be completed by May 24, 2022; and
- All dispositive motions shall be heard by August 19, 2022 at 10:00 am.

**SO ORDERED.**

DATED: October 8, 2021.

  
CHIEF UNITED STATES DISTRICT JUDGE